

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

HELEN NICHOLSON,

Plaintiff,

vs.

SECURITAS SECURITY
SERVICES, USA, INC.,

Defendant.

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Civil Action No. 4:14-cv-172

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

TO THE HONORABLE JUDGE O'CONNOR:

Plaintiff Helen Nicholson moves for a partial summary judgment finding that Defendant Securitas Security Services, USA, Inc. violated the Age Discrimination Act, and that Securitas has insufficient evidence to present the affirmative defense of failure to mitigate damages.

Pursuant to Local Rule 56.3(b), Nicholson sets forth the contents required by Local Rule 56.3(a) in her brief in support of this motion.

WHEREFORE, Nicholson requests that the Court grant her partial motion for summary judgment as to Securitas's liability and its affirmative defense of failure to mitigate damages.

Respectfully submitted,

By: /s/ Brian P. Sanford
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ATTORNEYS FOR PLAINTIFF
HELEN NICHOLSON

CERTIFICATE OF SERVICE

On November 7, 2016, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian P. Sanford